

**EXHIBIT B**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN SECTION

C.A. No. 1:04-CV-11217 PBS

EXPERIENCE HENDRIX, L.L.C., ET  
AL.,

Plaintiffs,

v.

TANGRADI, INC.,

Defendant.

**DECLARATION OF STEPHEN S.  
YOUNG, ESQUIRE, IN SUPPORT  
OF PLAINTIFFS' MOTION FOR AN  
ASSESSMENT OF DAMAGES AS TO  
ATTORNEYS' FEES**

Stephen S. Young, hereby says:

1. I am attorney for plaintiffs in the above-entitled matter and am familiar with the facts and proceedings in this matter. This declaration is made in support of Plaintiffs' Motion for an Assessment of Damages as that motion applies to the awarding of attorneys' fees.

2. The following services were or are reasonably anticipated to be rendered in this matter:

- (a) Ascertainment of corporate status of corporate defendant and identity of officers for the purpose of service of process;
- (b) Preparation of Complaint for filing;
- (c) Application to clerk for default;

- (d) Drafting and filing of motion for assessment of damages and supporting declarations;
- (e) Drafting and filing of motion for default judgment;
- (f) Miscellaneous correspondence; and
- (g) Anticipated post-judgment services.


3. It is respectfully suggested that reasonable fees for the above services would be \$1,200.00 and it is requested that plaintiffs be awarded a fee in that amount. Attached hereto is a copy of contemporaneous time records which detail the services rendered to date, the dates those services were rendered, the time spent performing those services, and the applicable billing rates and initials of the persons who performed those services.

4. One individual in this office worked on this case, Stephen S. Young (initials on time records are "SSY").

5. Stephen Young passed the bar in 1968. He became an associate at Sherburne, Powers & Needham (presently known as Holland & Knight LLP) in 1970, specializing in civil litigation. He has been a partner or shareholder since 1976. Since initially coming to the firm he has represented the American Society of Composers, Authors & Publishers ("ASCAP") and its members in connection with copyright infringement litigation throughout Massachusetts. He has been admitted to practice in the United States District Court for the District of Massachusetts, the Court of Appeals for the First Circuit, and the United States Supreme Court.

6. Major cash disbursements are not set forth in this declaration since they will be recovered by way of a bill of costs.

I certify under penalty of perjury that the foregoing is true and correct.

  
Stephen S. Young

October 5, 2004

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## AMERICAN SOCIETY OF COMPOSERS, AUTHORS AND PUBLISHERS

Tangradi, Inc.  
d/b/a Black Rock Tuscan Grille

Lawyer	Date	Hours	Description
SSY	5/17/04	.50	Review general license file; send demand letter.
SSY	5/26/04	.10	Review file regarding settlement authorization.
SSY	6/1/04	.30	Review file; prepare for and filing of complaint; notify client.
SSY	8/2/04	.20	Review file; call deputy sheriff's office regarding service.
SSY	8/24/04	.30	Review file; file summons with court via electronic filing; prepare letter to client regarding service.
SSY	9/16/04	.30	Review file; draft and prepare and forward to court request for default.
SSY	9/28/04	.90	Review file regarding default; prepare motions for default judgment and for assessment of damages and supporting declarations; send papers to client for review and execution.
SSY	9/29/04	.20	Finalize motion papers and send for review by client; finalize declaration and send to client for execution.
SSY	9/30/04	.20	Make changes in motion papers and send declaration to Ms. Ussery.

TOTAL TIME SPENT AND APPLICABLE RATES TO LAST DATE SHOWN:

SSY 3.00 hrs. at \$320 per hour

TOTAL BILL TO LAST DATE SHOWN: \$960.00

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